

# EXHIBIT 68-16



**Dimitrov vs  
Stavatti Aerospace**

**Rudy Chacon**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Valentino Dimitrov, individually )  
and on behalf of all others )  
similarly situated, )  
Plaintiff, )  
vs. ) Case No.  
Stavatti Aerospace, Ltd, a ) 2:23-CV-00226-PHX-DJH  
Minnesota corporation, et al., )  
Defendants. )  
\_\_\_\_\_  
)

VIDEOCONFERENCE DEPOSITION OF RUDY CHACON

Phoenix, Arizona  
January 21, 2025  
1:21 p.m.

REPORTED BY:  
TERESA A. WATSON, RMR  
Certified Reporter  
Certificate No. 50876

PREPARED FOR:  
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1 Stavatti opportunity?

2 A. From Brian Colvin.

3 Q. Exclusively?

4 A. Yeah.

5 Q. From Brian Colvin?

6 A. Yeah.

7 Q. And as it pertains to all the other investors that you  
8 had introduced, were all of those transactions facilitated by  
9 Brian Colvin?

10 A. Yes.

11 Q. And other than this transaction -- "this transaction"  
12 being the one with Valentino Dimitrov -- have -- has Brian  
13 Colvin, to your knowledge, received any sort of compensation or  
14 benefit from his fundraising efforts for Stavatti?

15 A. I'm not aware of anything that he received directly.

16 The only thing that I knew was that the 900,000 went into  
17 Stavatti account number one, and the 100,000 went into the  
18 Stavatti UAV account, from what I understood. But they were  
19 both Stavatti accounts.

20 Q. Did you have any visibility into any of those  
21 accounts?

22 A. No.

23 Q. And to your knowledge, the full amount was deposited  
24 by Mr. Colvin, correct?

25 A. I went to the bank and made the deposit.



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1 Q. You made the deposit?

2 A. Yeah. With Brian Colvin.

3 Q. Okay. And at which bank location did you make that  
4 deposit?

5 A. That was Bank of America San Pedro.

6 Q. And upon deposit, the -- just to confirm, upon  
7 deposit, the amount was bifurcated with 100,000 in the UAV  
8 account, and the remainder 900,000 in the other Stavatti  
9 account, correct?

10 A. Correct.

11 Q. To your knowledge, did Mr. Colvin have signature  
12 authority on either one of those accounts?

13 A. I don't know. I don't know.

14 Q. What was the nature of your conversation with  
15 Mr. Colvin on that day leading up to the deposit?

16 A. We're going to go deposit the money. That was  
17 basically the entire -- I mean, there wasn't any conversation  
18 about it, because, I mean, I wasn't -- I wasn't made aware of  
19 where the funds were going to be used immediately or anything  
20 like that, so I didn't -- wasn't my -- wasn't my...

21 Q. So how do you know the way they were bifurcated?

22 Would you like to pause?

23 A. No. I'm just...

24 Q. How do you know the way --

25 A. Because -- because of the deposit, when the deposit



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1 STATE OF ARIZONA )  
2 COUNTY OF MARICOPA ) SS.

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4 BE IT KNOWN that the foregoing proceedings were taken  
5 before me; that the witness before testifying was duly sworn by  
6 me to testify to the whole truth; that the foregoing pages are a  
full, true and accurate record of the proceedings, all done to  
the best of my skill and ability; that the proceedings were  
taken down by me in stenographic shorthand and thereafter  
7 reduced to print under my direction.

I CERTIFY that I am in no way related to any of the parties hereto, nor am I in any way interested in the outcome hereof.

[ ] Review and signature was requested; any changes made by the witness will be attached to the original transcript.

11 [X] Review and signature was waived/not requested.  
[ ] Review and signature not required.

I CERTIFY that I have complied with the ethical obligations set forth in ACJA 7-206(F)(3) and ACJA 7-206 J(1)(g)(1) and (2).

15 DATED at Phoenix, Arizona, this 21st day of February  
2025.

/s/ Teresa A. Watson

18 TERESA A. WATSON, RMR  
Certified Reporter  
Certificate No. 50876

I CERTIFY that GRIFFIN GROUP INTERNATIONAL has  
complied with the ethical obligations set forth in ACJA 7-206  
(I)(1)(g)(1) through (6).

23 /s/ Pamela A. Griffin

24 GRIFFIN GROUP INTERNATIONAL  
25 Registered Reporting Firm  
Arizona RRF No. R1005

